

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

C/A No.: 3:15-cv-03001-MBS-PJG

David Ray Tant,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	<b>ANSWERS TO LOCAL RULE 26.01</b>
William Frick, Solicitor's Office for the	)	<b>INTERROGATORIES OF DEFENDANT</b>
Sixth Judicial Circuit, South Carolina	)	<b>SOUTH CAROLINA DEPARTMENT</b>
Department of Corrections, South Carolina	)	<b>OF CORRECTIONS</b>
Office of the Attorney General, South	)	
Carolina Department of Probation, Parole	)	
and Pardon Services, Larry Ray Patton, Jr.,	)	
and John Does 1-5 (who are believed to be	)	
officers and/or employees of the South	)	
Carolina Department of Probation, Parole	)	
and Pardon Services), Orton Bellamy, C.	)	
David Baxter, Henry S. Eldridge, Marvin	)	
Stevenson, Norris Ashford, and Beverly	)	
Rice McAdams,	)	
Defendants.	)	

NOW COMES Defendant South Carolina Department of Corrections ("SCDC"), by and through counsel, and answer the Interrogatories set forth in Local Rule 26.01 of the Federal Rules of Civil Procedure as follows.

**A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

ANSWER: None.

**B. As to each claim, state whether it should be tried jury or non-jury and why.**

ANSWER: Plaintiff has requested that his claims to be tried to a jury, and some issues of liability not resolved prior to trial may be tried to a jury.

**C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company or which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

ANSWER: SCDC is a state agency.

**D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01**

ANSWER: Pursuant to Local Civil Rule 3.01(A)(1), SCDC believes that the proper division for this case is the Columbia Division, as many of the potential witnesses are in Richland County, and SCDC is headquartered in Richland County.

**E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how matters are related; and (3) a statement of the status of the related action.**

ANSWER: This matter is related to the action formerly filed in this District under C/A No.: 3:12-cv-03020-JFA-PJG.

**F. [Defendants only.] If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

ANSWER: SCDC is properly identified.

**G. [Defendants only.] If you contend that some other person or legal entity is, in whole or in party, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

ANSWER: SCDC makes no such contention.

Dated this the 30<sup>th</sup> day of July, 2015.

Respectfully submitted,

RICHARDSON PLOWDEN & ROBINSON, P.A.

s/Eugene H. Matthews

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**COUNSEL FOR SOUTH CAROLINA DEPARTMENT OF  
CORRECTIONS**